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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 Al-Okaibi, Wafa; Al-Okaibi, Ebrahim; Al-
18 Okaibi, Aiman; Al-Okaibi, Louay; Al-Okaibi,
19 Abdulraheem Khalil,

20 Plaintiffs,

21 v.

22 United States Department of Homeland
23 Security; United States Citizenship and
24 Immigration Services; Los Angeles Asylum
Office; David Radel, Director of the Los
Angeles Asylum Office; Chad Wolf,
Secretary, Department of Homeland Security;
Ken Cuccinelli, Acting Director, U.S.
Citizenship and Immigration Services;
Jennifer Higgins, Associate Director of
Refugee, Asylum, and International
Operations; Matthew D. Emrich, Associate
Director of USCIS Fraud Detection and
National Security Directorate; Office of
General Counsel U.S. Department of
Homeland Security; Christopher A. Wray,
Director of Federal Bureau of Investigations;
Attorney General, US Department of Justice,

25 Defendants.

26 Case No. 2:20-cv-02057-GMN-BNW

27 **Stipulation and Order**

28 **(First Request)**

29 Plaintiffs and Defendants, through their undersigned counsel, stipulate and request
30 that the Court approve a 30-day extension of time, from January 11, 2021 to February 10,
31 2021, for Respondents to file a response to the Complaint, ECF No. 1. This is the first
32 request for an extension of time.

1 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to
2 request additional time to perform an act, such as responding to a pleading, as requested
3 here.

4 This is an action for judicial review and mandamus; the matter would be decided
5 upon the Court's review of substantive briefs. Plaintiff resides in Las Vegas, Nevada, which
6 does not have a U.S. Citizenship and Immigration Services (USCIS) Asylum Office.

7 Without waiver, admission, or prejudice to any litigant's position in this matter, the
8 parties advise that they are engaged in efforts to resolve the matter as follows:

9 1. The USCIS Los Angeles Asylum Director has decided to exercise
10 discretion favorably and grant Plaintiff Wafa Al-Okaibi's request to expedite
11 an interview. The office has offered three interview dates, and Plaintiff has
12 opted for January 25, 2021, at 7:15 a.m. Plaintiff will bear all travel and
13 lodging related costs associated with the interview.

14 2. It is possible that Plaintiff or Defendants may need to reschedule the
15 interview date due to the exceptional circumstances presented by COVID-19
16 and to protect the health of the public, Plaintiff, and/or USCIS employees. In
17 the event that the interview needs to be rescheduled, it will remain a priority
18 for rescheduling, and USCIS will work with Plaintiff to reschedule the
19 interview as soon as possible to another mutually agreeable date and time;
20 and

21 3. Following the interview, the parties shall file a stipulation and order
22 for dismissal with prejudice, each party to bear its own costs and attorneys'
23 fees.

24 In the meantime, the due date for Respondents to file a response to the Complaint is
25 extended from January 11, 2021 to February 10, 2021.

1 This stipulated request is filed in good faith and not for the purposes of undue delay.
2

Respectfully submitted this 14th day of December 2020.

3 ABUSHARAR AND ASSOCIATES

4 NICHOLAS A. TRUTANICH
United States Attorney

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8 *Attorney for Plaintiffs*

5 /s/ Patrick Rose
6 PATRICK A. ROSE
7 Assistant United States Attorney
Attorneys for Respondents

9
10 **IT IS SO ORDERED**

11 **DATED:** 2:57 pm, December 18, 2020

12 
13 **BRENDA WEKSLER**
14 **UNITED STATES MAGISTRATE JUDGE**